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FILED IN THE  
U.S. DISTRICT COURT  
EASTERN DISTRICT OF WASHINGTON

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8 UNITED STATES DISTRICT COURT  
9 FOR THE EASTERN DISTRICT OF WASHINGTON

10 UNITED STATES OF AMERICA,  
11  
12 Plaintiff,

13  
14 vs.

15  
16 BRANDON C. CAMPBELL;  
17  
18 Defendants.

INFORMATION SUPERSEDING  
INDICTMENT

18 U.S.C. § 1591(a)(1), (b)(1)  
Sex Trafficking by Force, Fraud, or  
Coercion

4:19-CR-06007-SMJ-03

18 U.S.C. § 1594  
Forfeiture Allegations

19  
20  
21 The Grand Jury charges:

22 COUNT 1

23  
24 Beginning in or about April 2018, and continuing until in or about May  
25 2018, in the Eastern District of Washington and elsewhere, the Defendant,  
26 BRANDON C. CAMPBELL, knowingly, in or affecting interstate commerce,  
27  
28 recruited, harbored, transported, provided, obtained, advertised, and maintained

INFORMATION SUPERSEDING INDICTMENT

1 Victim W and Victim E, knowing and in reckless disregard of the fact that means  
2 of force, threats of force, fraud, and coercion would be used to cause Victim W and  
3 Victim E to engage in a commercial sex act, in violation of 18 U.S.C. § 1591(a)(1),  
4 (b)(1).

6 NOTICE OF CRIMINAL FORFEITURE

7  
8 The allegations contained in this Indictment are hereby realleged and  
9 incorporated by reference for the purpose of alleging forfeitures.

10 Pursuant to 18 U.S.C. § 1594, upon conviction of an offense(s) in violation  
11 of 18 U.S.C. § 1591, as charged in Count 1 of this Information Superseding  
12 Indictment, Defendant, BRANDON C. CAMPBELL, shall forfeit to the United  
13 States of America (1) any property, real or personal, involved in, used, or intended  
14 to be used to commit or to facilitate the commission of the offense[s], and any  
15 property traceable to such property; and (2) any property, real or personal,  
16 constituting or derived from, any proceeds obtained, directly or indirectly, as a  
17 result of the offense[s], and any property traceable to such property. The property  
18 to be forfeited includes, but is not limited to, the following:

19 A sum of money in U.S. currency representing the amount of  
20 proceeds obtained as a result of the sex trafficking offense(s).

21 If any of the property described above, as a result of any act or omission of  
22 the defendant[s]:

23 a. cannot be located upon the exercise of due diligence;



- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided without difficulty,

the United States of America shall be entitled to forfeiture of substitute property pursuant to 21 U.S.C. § 853(p), as incorporated by 28 U.S.C. § 2461(c).

Respectfully submitted,

William D. Hyslop  
United States Attorney



Meghan M. McCalla  
Assistant United States Attorney